

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

RICHARD GOLDEN and BEAK &  
BUMPER, LLC,

Judgment Creditors,

v.

JANG H. LIM doing business as Dental USA,  
Inc.,

Defendant.

Civil Action No. 16-cv-2440

**MOVANTS' MOTION TO QUASH**

Pursuant to Federal Rule of Civil Procedure 45, Movants, Bishop Diehl & Lee, LTD., Edward Bishop, and Nicholas Lee (collectively "BDL") hereby move the Court for an Order quashing the Citations to Discover Assets (attached hereto as Exhibits A, B, and C) served by Plaintiffs Richard Golden and Beak & Bumper, LLC (collectively "Golden").

The Citations to Discover Assets should be denied because to comply with the Citations would compel the Movants to not only breach the attorney-client privilege but also violate their ethical obligations under Illinois Rule of Professional Conduct 1.6(a), which provides in part that a lawyer "shall not reveal information relating to the representation of a client unless the client gives informed consent, the disclosure is impliedly authorized in order to carry out the representation, or the disclosure is permitted by paragraph (b) or required by paragraph (c)."

Additionally, even if the Court finds that the Citations to Discover Assets are proper and orders that the Movants must comply, the information requested necessitates the entering of a

protective order under Federal Rule of Civil Procedure 26(c), because the information requested in the Citations calls for non-public financial and proprietary information.

For the reasons set forth above, Movants respectfully request that this Court enter an order quashing the Citations to Discover Assets.

Dated: July 8, 2016

Respectfully submitted,

s/Nicholas S. Lee/  
Edward L. Bishop  
[ebishop@bishoppatents.com](mailto:ebishop@bishoppatents.com)  
Nicholas S. Lee  
[nlee@bishoppatents.com](mailto:nlee@bishoppatents.com)  
Bishop Diehl & Lee, LTD.  
1475 East Woodfield Road, Suite 800  
Schaumburg, IL 60173  
T: (847) 969-9123  
F: (847) 969-9124

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system on this date, July 8, 2016. Any other counsel of record will be served by electronic and/or first class mail.

/s/Nicholas S. Lee

Nicholas S. Lee